

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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CLERK'S OFFICE
AT GREENBELT

JOYCE RULAPAUGH
45605 Catalina Lane
California, MD 20619
Plaintiff

:
: BY *m* DEPUTY

v.

: Case No: *PX* 18 CV 3679

ST. MARY'S SHERIFF'S OFFICE
23150 Leonard Hall Drive
Leonardtown, MD 20650
Defendant

COMPLAINT FOR INJUNCTIVE RELIEF

COMES NOW the Plaintiff, JOYCE RULAPAUGH, pro se', and hereby files this action under the Freedom of Information Act, 5 U.S.C. §552 to order the production of agency telephone records, and in support thereof states as follows:

1. This court has jurisdiction over this action pursuant to 5 U.S.C. §552(a)(4)(B).
2. The Plaintiff is a private citizen and is the requester of the records, which defendant is now withholding. Plaintiff has requested this information for use in evaluating causation and damages in a potential separate civil action, and prompt release of the information is essential to the Plaintiff receiving ordered relief that is vitally necessary for her to avoid further significant personal and financial harm.
3. The St. Mary's Sheriff's Office is a government agency and has possession of the documents that the Plaintiff has requested.
4. Via a letter sent/mailed on October 27, 2018, the Plaintiff requested access to telephone records maintained by the St. Mary's Sheriff's Office (Exhibit A). A copy of the email/letter is attached hereto, as well as the Defendant's response, in which states that "The telephone extensions to all of the personnel you have named in your request are non-recorded lines. Furthermore, you are not entitled to any investigative information related to any investigation wherein you are a defendant" (Exhibit B). A copy of my email in

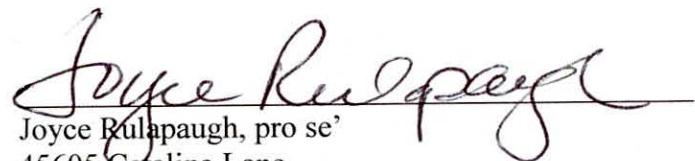
response to his letter (Exhibit B), along with an Affidavit of Indigency, and a copy of my Social Security Disability Statement are attached and labeled as Exhibit C.

5. As of the date of filing, no further response has been received thereto.
6. Plaintiff has made good faith efforts to resolve the issue and to request the overdue documentation, but no documents have been forthcoming.
7. Plaintiff has a right of access to the requested information under 5 U.S.C. §552(a)(3), and there is no legal basis for any denial of such access by the Defendant.

WHEREAS, the Plaintiff respectfully requests that this Honorable Court:

- A. Order the Defendant to provide access to the requested documents;
- B. Expedite this proceeding as provided for in 28 U.S.C. §1657;
- C. Award plaintiff costs and fees associated with the filing in this action, as provided in 5 U.S.C. §552(a)(4), in addition to any and all damages suffered by the Plaintiff as a result of the Defendant's actions, and
- D. Grant such other and further relief as may deem just and proper.

Respectfully Submitted,


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